

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

KONNECH, INC.,

PLAINTIFF,

v.

**TRUE THE VOTE, INC., GREGG
PHILLIPS, and CATHERINE
ENGELBRECHT,**

DEFENDANTS.

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CIVIL ACTION NO. 4:22-CV-03096

ORDER GRANTING PLAINTIFF’S MOTION FOR SANCTIONS

On this day came on to be heard Konnech, Inc.’s (“Konnech”) Motion for Sanctions Under FRCP 11 (“Motion”). The Court, having considered the Motion, any response thereto, any reply thereto, and the arguments of counsel, if any, finds that the Motion should be granted. It is therefore,

ORDERED that Konnech’s Motion is hereby GRANTED in all respects. It is further,

ORDERED that Konnech’s attorneys’ fees, expenses and costs incurred in connection with responding to Defendants True the Vote, Inc.’s, Gregg Phillips’, and Catherine Engelbrecht’s Motion to Recuse (“Motion to Recuse”), and in drafting the Motion, shall be borne by Defendants and their counsel; It is further,

ORDERED that within 3 days of this Order, Defendants and their counsel shall also pay sanctions of \$_____ to Konnech and a penalty of \$_____ into the registry of the Court to deter repetition of the conduct or comparable conduct by others similarly situated; It is further,

ORDERED that within 10 days of this Order, Konnech shall file any evidence concerning its attorneys' fees, expenses and costs incurred in connection with responding to the Motion to Recuse and in drafting the Motion, and Defendants shall file any countervailing evidence within 5 days after Konnech's filing. The Court shall then issue a separate order on the amount of reasonable and necessary attorneys' fees, expenses and costs that Defendants and their counsel will be ordered to pay to Konnech; It is further,

ORDERED that any attorneys' fees, expenses and costs incurred by Konnech in connection with responding to any mandamus or appeal of the Motion to Recuse or of this Order shall be borne by Defendants and their counsel, at which time the Court shall issue a separate order directing Konnech to file evidence of such fees, expenses and costs.

SIGNED on this _____ day of _____, 2023.

JUDGE PRESIDING